

EXHIBIT 2

Email Correspondence with
New Orleans Field Office Director Mellissa Harper

April 23, 2025



Fatima Khan <fatima@mylori.org>

URGENT: Parental Interest Inquiry

Fatima Khan [REDACTED]
To: "Harper, Mellissa B" [REDACTED]

Wed, Apr 23, 2025 at 10:50 AM

Good morning,

I am writing to follow up on my previous email and reiterate my request for a call with Ms. Lopez. I would also like to know the city and state where her children are currently located, as well as any deportation or travel plans for the family.

The information I have already provided should sufficiently demonstrate my status as Mr. Mendez's legal representative and his status as the girls father and I ask that you communicate with me accordingly. If you are unable to fulfill these requests, please provide the legal basis for your denial.

Thank you for your attention to this urgent matter.

Fatima

On Wed, Apr 23, 2025 at 9:54 AM Harper, Mellissa B <Mellissa.B.Harper@ice.dhs.gov> wrote:

The USC child is in the custody of the mother. If your client would like to come into the office, 1250 Poydras Street, 3rd Floor, New Orleans, LA, then we will attempt to verify his identity and the validity of documents that he wishes us to review.

Mellissa Harper

Field Office Director

New Orleans Field Office

Enforcement and Removal Operations

Immigration and Customs Enforcement

Cell 404-925-2768

From: Fatima Khan [REDACTED] >**Sent:** Tuesday, April 22, 2025 9:49 PM**To:** Harper, Mellissa B <[REDACTED]>; Hartnett, John [REDACTED] >;

Nguyen, Paul K <[REDACTED]>; Maher, Lisa <[REDACTED]>

Subject: URGENT: Parental Interest Inquiry

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Good evening,

I represent Mr. Adiel Mendez, father of V [REDACTED] L [REDACTED] M [REDACTED] L [REDACTED] (11) and V [REDACTED] L [REDACTED] M [REDACTED] L [REDACTED] (3). It is my understanding that Ms. V [REDACTED] and V [REDACTED] accompanied their mother, Ms. Jenny Carolina Lopez Villelga to her ICE Check-In and that these children are still in your custody without notification to any of their family members, in direct contravention to your directive ICE Directive 11064.3. Please note the following clauses that your office has failed to adhere to:

5.2 (3): "Unless ICE is effectuating an enforcement action against the minor child(ren), ICE personnel should under no circumstances take custody of or transport the minor child(ren)." **Please note that Valentina Lizeth is a US Citizen and both girls have been held under custody for more than 12 hours.**

5.3(2) In the limited circumstances in which detention is appropriate, the FODs must place the Covered Individual as close as practicable to the noncitizen's minor child(ren). **No effort has been made to contact Mr. Mendez about his daughters or inform him of their whereabouts.**

5.7(1) FODs must afford such detained Covered Individuals a reasonable opportunity to make a decision regarding the care or travel of their minor child(ren) or incapacitated adult for whom they serve as legal guardian, as well as to consult with counsel and a means by which to communicate with consulates and consular officials, notaries, courts, guardians ad litem, or family members in the appropriate time preceding removal in order to execute necessary documents (e.g., powers of attorney, passport applications, appointments of guardians, or other permissions), purchase airline tickets, and make necessary preparations prior to removal. **Ms. Lopez has not been able to contact me or communicate with her husband about her children. Her husband was only allowed a 40 second phone call that was cut short by an ICE officer upon trying to connect Ms. Lopez to counsel.**

5.7 (4) Factors to consider when facilitating reunification of a parent or legal guardian with their minor child(ren) prior to removal include, but are not limited to: Whether the other parent is in the United States or if the other parent has given permission for the minor child(ren) to return to the country of removal with the noncitizen parent or legal guardian. **Mr. Mendez has not given consent for his daughters to return to the designated country of removal.**

Your office's lack of care towards children and denial of access to counsel are a blatant denial of due process. It is also my understanding that Ms. Lopez is pregnant which only makes these denials more egregious.

I am requesting the following actions be taken immediately:

- A pause on executing Ms. Lopez's order of removal until Mr. Mendez and Ms. Lopez have been able to speak and the Parental Interest protocol is respected, as well as her release.
- V [REDACTED] and Ms. V [REDACTED]'s **immediate release** to their family members
- A legal call scheduled between myself and Ms. Lopez
- Contact information for the Parental Interest Coordinator assigned to Ms. Lopez's case

Please see attached my bar card, drivers license, a G-28 from Mr. Adiel Mendez, his daughters' birth certificates listing that Mr. Mendez is their biological parent, and a properly executed provisional custody by mandate for his daughters to allow their aunt Ms. [REDACTED], to come pick them up.



Fatima Khan *she/they*

Supervising Attorney

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